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October 29, 2007

***BY ELECTRONIC FILING***

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington DC 20554

**Re: WTB Docket No. 07-121, In the Matter of Request for Declaratory Ruling by Wireless Strategies, Inc. Regarding Coordination of Microwave Links Under Part 101 of the Commission's rules**

Dear Ms. Dortch:

Pursuant to Section 1.1206(b)(1) of the Commission's Rules, FiberTower Corporation ("FiberTower") hereby electronically submits this written *ex parte* communication, in response to Wireless Strategies, Inc. ("WSI") filings on the above-referenced proceeding.<sup>1</sup>

WSI asks the Commission for a ruling to allow Fixed Service licensee operate multiple links with antennas with distributed radiating elements ("DREs").<sup>2</sup>

**MULTIPOINT STYLE LINKAGES ARE ALREADY AVAILABLE USING  
THE CURRENT COORDINATION SYSTEM**

Multiple point-to-point paths stemming from a hub location are routinely placed on one license under Part 101 Fixed Services rules, and WSI, or any

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<sup>1</sup> 47 C.F.R. § 1.1206(b)(1).

<sup>2</sup> In the Matter of Request for Declaratory Ruling By Wireless Strategies Inc. Regarding Coordination of Microwave Links Under Part 101 of the Commission's Rules, WTB Docket No. 07-121, *WSI Request for Declaratory Ruling* (Feb. 27, 2007).

other applicant, may avail itself of that process which effectively provides a multipoint-style service.

## HARMFUL INTERFERENCE MAY RESULT FROM IGNORING CURRENT COORDINATION RULE PROTOCOLS

Generally speaking, FiberTower supports the filed comments of Comsearch, Verizon, FWCC, and others with similar positions. Wireless Strategies' proposal directly conflicts with the Commission's Fixed Service antenna licensing and coordination rules. As described by WSI, the use of sidelobe frequencies via DREs would conflict with the required radiation pattern envelope and beamwidth requirements set forth in Section 101.115 of the Commission's Rules.<sup>3</sup> In addition, WSI's proposed operations do not comply with existing Section 101.103 coordination requirements.<sup>4</sup> Despite requests from commenters, WSI's responses and *ex parte* filing have not clarified how its proposal complies with existing Commission rules on antenna standards and frequency coordination. At its core, the WSI proposal fails to explain how it plans to legally provide additional communications paths without specifically defining the designated coordinates for these additional paths. Without such coordination, the critical public and private licensed services currently operating in the band could be subject to interference from unregistered, and thus "unreasonably unknowable," maverick operations.

WSI's proposal for concurrent coordination of multiple links is likely to increase interference with other licensees' operations in high traffic areas. Interference is normally limited in the fixed services band by full disclosure to the FCC (and other licensees) of location and operations of each path.<sup>5</sup> Without individual coordination, deployments of unspecified paths raise the potential of harmful interference to currently operating paths.

For the foregoing reasons, the Commission should reject WSI's request.

Please do not hesitate to contact us with questions.

Respectfully submitted,

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/s/

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<sup>3</sup> 47 C.F.R. § 101.115.

<sup>4</sup> 47 C.F.R. § 101.103.

<sup>5</sup> *Id.*

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